

**REMARKS**

The Office Action rejected claims 33, 34, 39-44, 46, and 51-57 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,798,767 (“Alexander”) in view of U.S. Patent No. 6,278,697 (“Brody”). In addition, the Office Action rejected claims 35-37, 45, and 47-50 under 35 U.S.C. §103(a) as being unpatentable over Alexander in view of Brody and further in view of U.S. Patent Application Publication No. 2004/0180646 (“Donley”). Reconsideration and allowance of the claims are respectfully requested.

**Claims 33-38**

Alexander and Brody, whether alone or in combination, fail to disclose or suggest each and every element of independent claim 33. For example, Alexander and Brody do not disclose or suggest “storing, at a mediation server, first connection information and second connection information, the first connection information including ... a first set of call receipt rules relating to calls placed to the first plurality of devices, and the second connection information including ... a second set of call receipt rules relating to calls placed to the second plurality of devices ... wherein the first set of call receipt rules relates to a first format of IP data that is acceptable to the first plurality of devices; and wherein the second set of call receipt rules relates to a second format of IP data that is acceptable to the second plurality of devices” as recited in claim 33.

Alexander discloses a communication system including a “call manager” that controls processing and routing of calls between IP telephony devices. When a user wishes to place a call from one IP telephony device to another, the call manager checks the availability of the called telephony device and sets up the call. The call manager includes an alternate number list that identifies alternate telephony devices to be signaled in response to an incoming call directed at a target telephony device. In this regard, the call manager includes mapping tables associating a network address with each identified alternate telephony device. However, neither the call manager, nor any other component of Alexander’s communication system, is a mediation server at which first and second connection information is stored. Nothing in the reference discloses or suggests storing connection information including call receive rules, which relate to a particular format of IP data that is acceptable to a plurality of devices associated with a particular managed IP network. In fact, the Office Action acknowledges that Alexander does not disclose call receipt rules relating to a second format of IP data acceptable to a second plurality of devices.

The Office Action, however, asserts that Brody discloses converting a first protocol message into a second protocol message, and that it would have been obvious to one having ordinary skill in the art to modify the system of Alexander by adding Brody's protocol conversion feature so that other types of second networks could be serviced. (Pages 3-4 of the Office Action).

However, Brody also does not disclose or suggest storing connection information at a mediation server including call receive rules, which relate to a particular format of IP data that is acceptable to a plurality of devices associated with first and second managed IP networks. Brody discloses a system for processing multi-protocol communications for wireless services such as CDMA, TDMA, GSM, etc. Brody discloses receiving a message from a first wireless communications device identifying the first communications device and a second wireless communications device to be called, which uses a different protocol. The system includes a first communications protocol server, which is identified based on the protocol used by the first communications device. The first communications protocol server converts the received message into a generic protocol message. This generic protocol message is then transmitted by the first communication protocol server to a second communications protocol server. The second communications protocol server then converts the generic protocol message into a second communications protocol format, which is subsequently sent to the second communications device. (Col. 3, lines 20-55). Brody, in short, discloses a particular technique for converting a message from one wireless protocol to another. The Brody reference, however, does not disclose or suggest any type of mediation server storing call receipt rules for devices relating to different formats of IP data acceptable by devices associated with different managed IP networks. Therefore, Alexander and Brody do not disclose or suggest "storing, at a mediation server, first connection information and second connection information, the first connection information including ... a first set of call receipt rules relating to calls placed to the first plurality of devices, and the second connection information including ... a second set of call receipt rules relating to calls placed to the second plurality of devices ... wherein the first set of call receipt rules relates to a first format of IP data that is acceptable to the first plurality of devices; and wherein the second set of call receipt rules relates to a second format of IP data that is acceptable to the second plurality of devices" as recited in claim 33.

Furthermore, both Alexander and Brody fail to disclose or suggest "sending, in response to the query, the first connection information related to the device associated with the first

managed IP network from the mediation server to the device associated with the second managed IP network,” as recited in claim 33. As discussed above, in Alexander, when a user wishes to place a call from one IP telephony device to another, the call manager checks the availability of the called telephony device and sets up the call. The call manager does not send any connection information related to the called device to the device placing the call because the call manager has already set up the call and the calling device does not need this information to make the call. Similarly, Brody does not send to the calling wireless device connection information relating to the called wireless device because, Brody discloses converting the message received from the first device into a generic protocol message, and then into a second communications protocol format, which is subsequently sent to the called device.

Claim 33 is therefore patentable over Alexander and Brody. Claims 34-38 depend from claim 33, which Applicant has shown to be allowable. Hence, Alexander and Brody fail to disclose at least one element of each of claims 34-38. Accordingly, claims 34-38 are also allowable, at least by virtue of their dependency from claim 33.

With respect to claims 35-37, the Examiner cited Donley as teaching the various additional features recited in these claims. However, even assuming *arguendo* that Donley teaches the additional features as alleged, the reference still fails to cure the defects of Alexander and Brody as discussed above. Thus, claims 35-37 are also patentable over the combination of Alexander, Brody, and Donley.

### **Claims 39-41**

In light of the foregoing, the rejection of independent claim 39 should also be withdrawn. Claim 39 recites: “sending a query to an information store from the device associated with the first managed IP network to identify connection information relating to the device associated with the second managed IP network, wherein the connection information includes a set of call receipt rules that relates to a format of IP data that is acceptable to the device associated with the second managed IP network; receiving the requested connection information at the device associated with the first managed IP network from the information store; converting, at the device associated with the first managed IP network, IP data associated with the call to the format of IP data that is acceptable to the device associated with the second managed IP network.” Alexander and Brody, alone or in combination, fail to disclose storing connection

information including a set of call receipt rules relating to a format of IP data acceptable to a called device. Additionally, neither reference discloses or suggests receiving connection information at a device from the information store. Moreover, neither reference discloses or suggests converting at the device IP data from one format to another. Therefore, independent claim 39 is patentable over the combination of Alexander and Brody.

Claims 40 and 41 depend from claim 39, and are also allowable over Alexander and Brady, at least by virtue of their dependency from claim 39.

### **Claims 42-50**

Claim 42 recites “an information store to store first connection information and second connection information, the first connection information including a unique address for each of a first plurality of devices associated with a first managed Internet Protocol (IP) network and a first set of call receipt rules relating to calls placed to the first plurality of devices, and the second connection information including a unique address for each of a second plurality of devices associated with a second managed IP network and a second set of call receipt rules relating to calls placed to the second plurality of devices; and ... a communication engine executable by the processor to send, in response to the query, the first connection information related to the device associated with the first managed IP network to the device associated with the second managed IP network.”

Alexander and Brody, alone or in combination, fail to disclose or suggest storing connection information including a set of call receipt rules relating to calls placed to devices associated with different managed IP networks. Additionally, neither reference discloses or suggests sending connection information to a device from the information store. Therefore, independent claim 42 is patentable over the combination of Alexander and Brody.

Claims 43-50 depend from claim 42, and are also allowable over Alexander and Brody, at least by virtue of their dependency from claim 42.

With respect to claims 45 and 47-50, the Examiner cited Donley as teaching the various additional features recited in these claims. However, Donley fails to cure the defects of Alexander and Brody as discussed above. Thus, claims 45 and 47-50 are also patentable over the combination of Alexander, Brody, and Donley.

**Claims 51-56**

Claim 51 recites “a first managed Internet Protocol (IP) network device including ... a connection information engine executable by the processor to send a query to an information store to identify connection information relating to the device associated with the second managed IP network, wherein the connection information includes a set of call receipt rules that relates to a format of IP data that is acceptable to the device associated with the second managed IP network; [and] a data conversion engine executable by the processor to convert IP data associated with the call to the format of IP data acceptable to the device associated with the second managed IP network after receiving the requested connection information.”

Alexander and Brody, alone or in combination, fail to disclose or suggest an information store storing connection information including a set of call receipt rules relating to calls placed to devices associated with different managed IP networks. Additionally, neither reference discloses or suggests a managed IP network device converting IP data associated with the call to the format of IP data acceptable to the device associated with the second managed IP network after receiving the requested connection information. As discussed above, Alexander does not convert IP data to a different format associated with a second IP network. Brody discloses use of different communications protocol servers for wireless protocol conversion. Therefore, independent claim 51 is patentable over the combination of Alexander and Brody.

Claims 52-56 depend from claim 51, and are allowable over Alexander and Brody, at least by virtue of their dependency from claim 51.

**Claim 57**

Claim 57 recites “storing, at a mediation server, first connection information and second connection information, the first connection information including a unique address for each of a first plurality of devices associated with a first managed Internet Protocol (IP) network and a first set of call receipt rules relating to calls placed to the first plurality of devices, and the second connection information including a unique address for each of a second plurality of devices associated with a second managed IP network and a second set of call receipt rules relating to calls placed to the second plurality of devices; ... [and] sending, in response to the query, the first connection information related to the device associated with the first managed IP network from the mediation server to the device associated with the second managed IP network.”

Alexander and Brody, alone or in combination, fail to disclose or suggest storing connection information including a set of call receipt rules relating to a format of IP data acceptable to a called device. Additionally, neither reference discloses or suggests sending connection information to a device. Therefore, independent claim 57 is patentable over the combination of Alexander and Brody.

### CONCLUSION

Applicant has pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

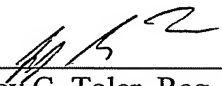
Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

10-26-2007  
Date

  
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